

FILED  
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

2000 SEP 14 P 4:00

ERIC V. BISHOP, SR., et al.

Plaintiffs

CLERK'S OFFICE  
AT BALTIMORE

BY \* DEPUTY

vs.

\* Civil No. WMN-00-1456

PERDUE FARMS, INC.

\*

Defendant.

\*

\* \* \* \* \*

**PLAINTIFFS' REPORT TO THE COURT REGARDING DEPOSITION HOURS**

The Plaintiffs, through counsel, file this report pursuant to the Scheduling Order issued pursuant to Local Rule 103.9 on August 9, 2000. The Court asked the parties to provide a report on the expected number of deposition hours by August 23, 2000

This case is virtually identical to that of Heath v. Perdue, Civil No., WMN-98- 3159, which is also pending before this Court. The only difference in the cases is the identity of the individual plaintiffs. Thus, the parties have agreed that the final legal decisions in the Heath case will also bind the parties in this case.

Over the course of this summer, the parties have engaged in extensive discovery, attempting to ascertain the extent of damages in the Heath case. In October and November, the parties will file extensive briefs on this issue with this Court. Because this Court's decision with respect to damages in Heath will also bind this case, the areas which need be the subject of discovery in this matter are minimal.

Counsel for the plaintiffs has proposed that the defendant pose the questions necessary for

APPROVED  
September 14, 2000  
[Signature]  
NITEL

determination of the damages in this matter to the plaintiffs by interrogatory. Only if the interrogatories and documents produced reveal an ambiguity or discrepancy, will depositions be taken of those particular individuals. Counsel for the defendant is presently considering this proposal.

With respect to the plaintiffs, unless new issues regarding damages arise in the course of this litigation, counsel for the plaintiff anticipates needing to take no more than 10 to 15 hours of depositions in this matter.

Respectfully submitted,

A handwritten signature in cursive script, reading "Edgar N. James / Inc", written over a horizontal line.

Edgar N. James  
(Federal Bar No. 02805)  
Judith M. Conti  
JAMES & HOFFMAN  
1146 19<sup>th</sup> Street, N.W.  
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August 18, 2000

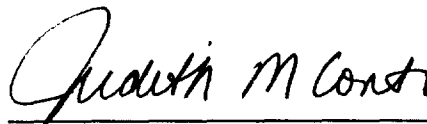
Counsel for the Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of August, 2000, a copy of Plaintiffs' Report to the Court Regarding Deposition Hours and this Certificate of Service were mailed first-class, postage prepaid, to:

Gregory P. McGuire, Esquire  
Glenn Spencer, Esquire  
Haynsworth, Baldwin, Johnson & Greaves, LLC,  
P.O. Box 10035  
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Bryan D. Bolton  
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A handwritten signature in cursive script, reading "Judith M. Conti", is written over a horizontal line.

Judith M. Conti